UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

JOCELYN GEORGES,   )
)
            Plaintiff,   )
)
    v.   )
)   C.A. No. 03-12553-REK
PARTNERS HEALTHCARE   )
SYSTEM, INC., a/k/a   )
MASSACHUSETTS GENERAL   )
HOSPITAL,   )
)
            Defendants.   )

DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

Defendants Partners HealthCare System, Inc. and The General Hospital

Corporation, d/b/a Massachusetts General Hospital ("the Hospital"), hereby respectfully

move that this Court enter judgment in their favor on Plaintiff's Complaint, pursuant to

Fed.R.Civ.P. 56(b) and L.R.D.Mass. 56.1. As grounds, the Hospital states that there is no

genuine issue of material fact with respect to Plaintiff's claim of race discrimination in

employment by the Hospital pursuant to 42 U.S.C. section 2000e-2 ("Title VII"), and the

Hospital is entitled to judgment as a matter of law.

In further support of its Motion, the Hospital submits the L.R.D. Mass. 56.1

Statement of Undisputed Facts with Exhibits, and Memorandum of Law filed herewith.

WHEREFORE, the Hospital respectfully requests that the Court grant this motion, and

enter judgment against Plaintiff and in favor of both Defendants.[1]

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[1]   Partners HealthCare System Inc. was not Plaintiff's employer, and there is no factual
basis of record for a claim against this entity.

PARTNERS HEALTHCARE SYSTEM, INC.,
THE GENERAL HOSPITAL CORPORATION, d/b/a
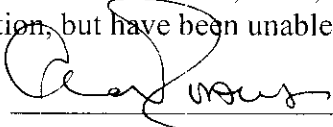MASSACHUSETTS GENERAL HOSPITAL
By their attorneys,

Christine M. Roach—BBO No. 421630
ROACH & CARPENTER, P.C.
24 School Street
Boston, MA 02108
(617) 720-1800

DATED: November 12, 2004

L.R.D. MASS. RULE 7.1(A)(2) CERTIFICATION

I, Christine M. Roach, hereby certify that counsel for the parties have conferred throughout the litigation, most recently by telephone on November 10, 2004, in an effort to resolve or narrow the issues presented in this motion, but have been unable to do so.

DATED: November 12, 2004

CERTIFICATE OF SERVICE

I, Christine M. Roach, hereby certify that I have served the above pleading on the opposing party by this day hand delivering a copy of same to counsel of record.

DATED: November 12, 2004